

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

REAL GOOD TECHNOLOGIES, LLC)	CASE NO. 1:15-CV-01079-JG
)	
Plaintiff,)	JUDGE: JAMES S. GWIN
)	
vs.)	<u>MOTION FOR LEAVE TO</u>
)	<u>WITHDRAW AS COUNSEL FOR</u>
VICTORY SOLUTIONS, LLC)	<u>VICTORY SOLUTIONS, LLC</u>
)	
Defendant.)	

Casarona Legal Services, LLC and Robert B. Casarona, respectfully move this Court for leave to withdraw as counsel for defendant Victory Solutions, LLC for the reason that counsel and the defendant are no longer working together inasmuch as counsel was retained for this lawsuit and the lawsuit has been ordered to arbitration and stayed. Further, counsel and Victory Solutions, LLC have irreconcilable differences. Since this matter is stayed pending the arbitration, there is no prejudice to Victory Solutions, LLC by the withdrawal inasmuch as the defendant has more than sufficient time to hire replacement counsel, if such counsel is needed. Victory solutions, LLC has been advised of this Motion and has not objected to its filing. The opposing counsel and Victory Solutions, LLC have been notified of this Motion as well.

Respectfully submitted,

/s/ Robert B. Casarona
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PROOF OF SERVICE

The foregoing document was electronically filed with the court on November 20, 2015. Copies were served on all counsel of record by and through the operation of the electronic filing system. A copy was also served by electronic mail on Mark Fusco, counsel for the Plaintiff at Mfusco@walterhav.com.

/s/ Robert B. Casarona

Robert B. Casarona